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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**AGENDA AND JOINT STATEMENT
FOR JUNE 13, 2025, CASE
MANAGEMENT CONFERENCE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Case Management Order (“CMO”) No. 1 (ECF 75), the Parties submit this agenda and joint statement in advance of the June 13, 2025 Case Management Conference (“CMC”).

I. Agenda for Case Management Conference

Pursuant to CMO 18, the Parties offer the below proposed agenda for the CMC scheduled for June 13, 2025:

- Hearing on Defendants’ Motion to Preclude Plaintiffs from Relying on Late Disclosed School District Witnesses (*Hillsborough, Jordon, Tucson*) (ECF 1951, 1973)
- Hearing on PI and SD Trial Bellwether Selection

II. Joint JCCP Update

Judge Kuhl held a JCCP CMC on May 5, 2025. At the May 5 CMC, Judge Kuhl considered the parties’ positions with respect to a number of issues, including Defendants’ requests for production of additional account materials, Plaintiffs’ request for written discovery regarding Defendants’ affirmative defenses and other discovery requests served by the Trial Pool 1 bellwether plaintiffs on April 21, Plaintiffs’ request for PMQ depositions regarding Defendants’ bellwether data productions, Plaintiffs’ requests for production that were previously held in abeyance, Defendants’ request for amendment of short-form complaints by bellwether plaintiffs who were minors at time of filing but who are no longer minors, the procedures for mental examinations of bellwether Plaintiffs, the schedule for an early track of motions for summary judgment on Section 230 and statute of limitations in certain bellwether cases, and disclosure of data underlying expert reports. Judge Kuhl also heard argument on YouTube’s demurrer to a bellwether plaintiff’s amended complaint, and sustained the demurrer without leave to amend on statute of limitations grounds. The minute order issued following the May 5, 2025, JCCP CMC is attached as **Exhibit A**. Plaintiffs’ PMQ depositions on Defendants’ usage data will take place on June 6, 10, 12, and 13.

Phase 2 fact discovery is wrapping up in the Trial Pool 1 bellwether cases, as certain depositions that the parties agreed to hold after the May 23, 2025, close of Phase 2 fact discovery are concluding. The parties completed simultaneous exchanges of opening and rebuttal general causation expert reports on April 18 and May 16, respectively. Depositions of general causation experts are scheduled

throughout June and July, in advance of the July 28 deadline for *Sargon* briefs to be filed as to General Causation experts.

The parties will simultaneously exchange opening expert reports on all remaining issues (i.e., case-specific and non-general causation) for the Trial Pool 1 cases on June 13, followed by a simultaneous exchange of rebuttal reports on July 3. The next JCCP CMC is on June 16, 2025.

III. Joint Discovery Update

A copy of the following discovery-related submissions and orders, which were (or will by the next MDL CMC have been) filed or issued since the last MDL CMC Statement was filed, will be sent by email to Judge Gonzalez Rogers after this CMC Statement is filed:

- Joint Status Report on Protocol for Production of Expert-Related Documents (ECF 1919)
- Order Resolving Dispute Re: Deposition of Non-Party Sarah Wynn-Williams (ECF 1979); *see also* ECF 1927 (Joint Letter Brief re same)
- Order On Stipulated Protocol for Production of Expert-Related Documents (ECF 1933); *see also* ECF 1931 (Proposed Order re same)
- Order Re Privileged Assertion Re Two Documents Clawed Back by Plaintiff Jessica Smith (ECF 1940); *see also* ECF 1939 (Order Re Filing Public Version of Order); ECF 1935 (Joint Stipulation and Proposed Order re same)
- Order Re Plaintiffs' Use of Highly Confidential "Meta Platforms" Custodian Documents with Former Meta Employees in Deposition (ECF 1936)
- Order Extending Certain Expert and Related Pretrial Deadlines (ECF 1955); *see also* ECF 1953 (Stipulation and Proposed Order re same)
- Joint Letter Brief Re: Defendants' Requests for Production from Plaintiffs' Data Sources (ECF 1957); *see also* ECF 1993 (Order re Filing Declarations and Exhibits re same); ECF 2002 (Notice by Plaintiffs' Steering Committee regarding Joint Letter Brief with Attached Declaration and Exhibits), ECF 2004 (Declaration of Jori M. Loren in Support of Joint Letter Brief)
- Order Resolving Dispute Re: Document Subpoenas to NonParties Bejar and Jayakumar; Denying Meta's Administrative Motion for Leave to File Supplemental Briefing Re: Same (ECF

1 1963); *see also* ECF 2006 (Defendant Meta Platforms, Inc.’s Motion for Relief from
2 Nondispositive Pretrial Order of Magistrate Judge)

- 3 ● Order Resolving Dispute Regarding Meta’s Amended 30(b)(6) Notice to State Plaintiffs (ECF
4 1964)
- 5 ● Order to Modify the Briefing Schedule Re Non-Custodian Sources (ECF 1972); *see also* ECF
6 1965 (Joint Stipulation and Proposed Order re same)
- 7 ● Joint Letter Brief Regarding YouTube’s Search and Production from Noncustodial Source “B”
8 (ECF 1974)
- 9 ● Order Extending Deadline for Colorado to Complete State Agency Document Productions (ECF
10 1988); *see also* ECF 1982 (Stipulation and Proposed Order re same)
- 11 ● Order Resolving Dispute Re: “Time Period” to Be Covered in State AGs’ Rule 30(B)(6)
12 Deposition of Meta (ECF 1990); *see also* ECF 1956 (Joint Letter Brief re same)
- 13 ● Order Resolving Dispute Re Plaintiff Tucson Unified School District (“TUSD”) Narrative Data
14 from Synergy Platform (ECF 1998); ECF 1949 (Joint Letter Brief re same), ECF 1995 (Joint
15 Filing re same)
- 16 ● Joint Letter Brief Re: State AGs’ RFA Nos. 16 and 46, and Relevant Time Period (*forthcoming*)
- 17 ● Joint Letter Brief Re: State AGs’ Amended 30(b)(6) Deposition Notice Topic 4(h) (*forthcoming*)
- 18 ● Notice of Withdrawal of Motion to Compel enforcement of deposition subpoenas issued to
19 nonparties Dora Rodriguez and Juana Rodriguez in the M.G. bellwether case. (4:25-mc-80121-
20 YGR ECF No. 26)

1 Respectfully submitted,

2 DATED: June 6, 2025

By: /s/ Lexi J. Hazam

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: June 6, 2025

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